

NO. PD-1053-19

**IN THE COURT OF CRIMINAL APPEALS
OF TEXAS**

FILED
COURT OF CRIMINAL APPEALS
12/10/2020
DEANA WILLIAMSON, CLERK

ALLEN BRAY PUGH
Appellant,
v.
THE STATE OF TEXAS,
Appellee.

On Appeal from the 42nd District Court
of Taylor County, Texas
Cause No. 26281-A
(Hon. James Eidson)

and

Cause No. 11-17-00216-CR

from the
COURT OF APPEALS FOR THE ELEVENTH JUDICIAL DISTRICT
EASTLAND, TEXAS

JEFFREY A. PROPST'S MOTION TO WITHDRAW AS COUNSEL

TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

Now comes Jeffrey A. Propst, co-counsel for Allen Bray Pugh, and files this
Motion to Withdraw as Counsel.

CAUSE FOR WITHDRAWAL

Withdrawal of counsel is permissible when withdrawal can be accomplished
without material adverse effect on the interests of the client. TEX. DISC. R. OF

PROF'L CONDUCT 1.15(b)(1). Withdrawal of counsel in this case can be accomplished without material adverse effect on the interests of Mr. Pugh, because Mr. Pugh can rely on co-counsel, Rick Dunbar, who is listed as an attorney of record in this case and in the case from the appellate court.

Further, other good cause for withdrawal exists. *See* TEX. DISC. R. OF PROF'L CONDUCT 1.15(b)(7). Specifically, Jeffrey A. Propst is permanently closing his law practice in December 2020 to assume the role of District Judge in the 104th District Court of Taylor County, Texas, on January 1, 2021.

CONSENT OF MR. PUGH

Mr. Pugh has been informed of the circumstances and the need for Jeffrey A. Propst to withdraw. Mr. Pugh consents to the withdrawal as is evidenced by the attached consent form.

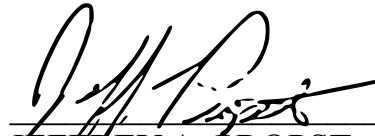
DEADLINES

There are currently no deadlines in this case. The case was submitted by oral argument and is awaiting decision.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Jeffrey A. Propst asks this Honorable Court to issue an order discharging him from the case as attorney for Allen Bray Pugh.

Respectfully submitted,



JEFFREY A. PROPST

Texas Bar No. 24064062

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Email: jeff@keithandpropst.com

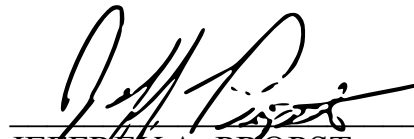
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following on November 23, 2020:

Allen Bray Pugh, Appellant
by mail to TDCJ - Hughes Unit

Britt Lindsey, Attorney for the State of Texas
by email

Rick Dunbar, Attorney for Appellant
by email



JEFFREY A. PROPST

CERTIFICATE OF COMPLIANCE

I hereby certify that according to the word count function of the word processing software used to draft this motion, the word count is 421 words.

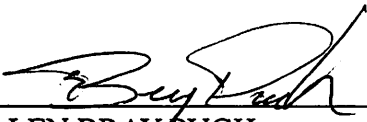


JEFFREY A. PROPST

CONSENT TO WITHDRAWAL OF ATTORNEY

I, Allen Bray Pugh, have been informed by my attorney that he is closing his law practice and wants to withdraw from my case. He has informed me of my right to oppose his motion to withdraw. I hereby consent to his withdrawal as my attorney.

DATE: 11-30-2020



ALLEN BRAY PUGH

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Jeffrey Propst on behalf of Jeffrey Propst
Bar No. 24064062
jeff@keithandpropst.com
Envelope ID: 48789952
Status as of 12/10/2020 9:27 AM CST

Associated Case Party: AllenBrayPugh

Name	BarNumber	Email	TimestampSubmitted	Status
Jeffrey Propst		jeff@keithandpropst.com	12/9/2020 2:05:36 PM	SENT
Rick Dunbar		rickdunbar2013@gmail.com	12/9/2020 2:05:36 PM	SENT

Associated Case Party: State

Name	BarNumber	Email	TimestampSubmitted	Status
Britt Lindsey		lindseyb@taylorcountytexas.org	12/9/2020 2:05:36 PM	SENT
Stacey Soule		information@spa.texas.gov	12/9/2020 2:05:36 PM	SENT